

**Evaluation of RRB E-Government Initiative:
RUIA Contribution Internet Reporting and Payment
Report No. 03-03, December 27, 2002**

INTRODUCTION

This report presents the results of the Office of Inspector General's (OIG) review of the Railroad Retirement Board's (RRB) E-government initiative for the railroad employer quarterly report and payment of contributions under the Railroad Unemployment and Insurance Act (RUIA).

BACKGROUND

The RRB's mission is to administer retirement/survivor and unemployment/sickness insurance benefit programs for railroad workers and their families. During fiscal year (FY) 2001, the RRB paid approximately \$8.4 billion in railroad retirement and survivor benefits to about 700,000 beneficiaries. The RRB also paid unemployment and sickness insurance benefits of \$95 million to some 40,000 claimants. As part of its responsibilities under the RUIA, the RRB collects employer contributions which are used to fund the RUIA benefit payments. Employers make contributions and report them to the RRB on a quarterly basis.

In the past, employers have reported contributions by submitting a paper copy of Form DC-1 to the RRB and have paid their RUIA contributions either by paper check or an electronic means. The electronic payment option was implemented in 1993 when the U.S. Department of the Treasury (Treasury) entered into a Memorandum of Understanding (MOU) with a financial intermediary, U.S. Bank (formerly Firststar Bank), to establish and operate an electronic system for collecting railroad retirement taxes and contributions. This system is termed the "RRBLink" system, and employers can use one of three different options to make electronic payments in the system. These options include personal computer/modem technology, telephone, and telephone voice technology. For the last quarter of calendar year 2001, approximately 73% of railroads used the RRBLink system to pay RUIA contributions.

Under the Government Paperwork Elimination Act (GPEA), Title XVII of Public Law 105-277, Federal agencies must provide for the optional use and acceptance of electronic documents and signatures, and electronic record keeping by October 21, 2003. In addition, the Administration's Management Agenda includes a goal for Federal agencies to expand the use of the Internet to provide government services. E-government is the term used to describe Federal agency initiatives to use information technologies to improve relationships with citizens, businesses and other sectors of government. For the RRB, E-government initiatives can serve a variety of needs, including better delivery of services to beneficiaries, improved interaction with railroad employers, customer empowerment through access to information, and more efficient agency management.

RRB officials responsible for employer reporting have determined that employers want to be able to exchange information with the RRB electronically. Therefore, RRB management has developed an Employer Reporting Initiative to automate current paper-based reporting, improve the efficiency and effectiveness of exchanges between the agency and employers, and streamline agency processes.

As one phase of the Employer Reporting Initiative, the RRB implemented the DC-1 Internet reporting and payment project in March 2002. The contractor, U.S. Bank, in conjunction with the RRB's Bureau of Fiscal Operations (BFO), modified the RRBLink system to add a new option for electronic payment over the Internet and allow for Internet filing of the DC-1 reports for those railroads that adopted the Internet payment option. The RRB and U.S. Bank signed a MOU in July 2002 regarding retention of the DC-1 data and RRB requests for information.

The RRB's 2000-2005 strategic plan has a goal to provide excellent customer service and includes an objective to ensure an efficient and effective reporting system for railroad employers. The plan also has a goal for using and leveraging technology to improve the agency's operational efficiency and effectiveness. This review speaks directly to these goals and objectives.

OBJECTIVE, SCOPE AND METHODOLOGY

The objective of this review was to assess the implementation of the DC-1 project. The scope included the development of the system beginning August 2001, the DC-1 forms filed for the quarter ending March 31, 2002, and other operations and activities relating to the DC-1 project through October 2002.

To accomplish the audit objective, we performed the audit steps detailed below:

- reviewed pertinent laws and regulations;
- reviewed RRB policies, procedures and other documents, including the Information Technology Steering Committee minutes, the Information Technology Capital Plan, and project plans for the DC-1 project and Employer Reporting Initiative;
- reviewed systems documentation relating to RRB and U.S. Bank development testing;
- reviewed Internet screens from RRBLink and tested applicable controls and requirements;
- documented and assessed security procedures over the Internet DC-1 filing process, including data security and access to RRB systems;
- evaluated the agreements with the RRB, Treasury and U.S. Bank/Firststar Bank;

- reviewed a judgmental sample of 20 Internet DC-1's submitted for data transmission and system-calculation errors;
- obtained comments from the 20 railroads in our judgmental sample on the usability of the DC-1 Internet filing process;
- obtained and reviewed additional input information needed by OIG's Office of Investigations from U.S. Bank for a judgmental sample of three railroads;
- interviewed RRB management and staff; and
- interviewed U.S. Bank management and staff.

The OIG conducted the audit in accordance with generally accepted government auditing standards. Auditors performed the fieldwork at the RRB headquarters office in Chicago, Illinois from October 2001 through October 2002.

RESULTS OF REVIEW

Our review of the recently implemented DC-1 project identified significant weaknesses in overall security of the Internet system, problems with the 2002 MOU, and concerns about the level of railroad participation in the Internet system. Our specific findings include:

1. The certification of the Internet DC-1 reports and payments cannot be adequately validated.
2. Security over usage of passwords should be significantly strengthened.
3. Additional password system controls should be fully implemented.
4. The 2002 MOU between the RRB and U.S. Bank lacks key details.
5. The monitoring provisions in the 2002 MOU for privacy and security of DC-1 data are inadequate.
6. The RRB needs to encourage increased participation in the Internet system to ensure it is not underused.

Detailed findings and recommendations are discussed below.

Certification of Internet DC-1 Cannot Be Adequately Validated

The RRB cannot adequately validate the certification of any Form DC-1, Employer's Quarterly Report of Contributions under the RUIA, filed using the Internet. Employers

filed over 200 DC-1 forms using the Internet system for the first and second quarters of calendar year 2002.

Two requirements for successful information assurance are authentication (users are who they claim to be) and non-repudiation (the user cannot deny his/her identity and responsibility for the action). The GPEA defines "electronic signature" as a method of signing an electronic message that (1) identifies and authenticates a particular person as the source of the electronic message and (2) indicates such person's approval of the information contained in the electronic message. The Office of Management and Budget's (OMB) guidance to implementation of the GPEA states that agencies should develop well-documented mechanisms and procedures to link transactions to individuals in a legally binding way.

The OMB's guidance recommends that, where necessary, agencies use a mutually understood, signed agreement between the person submitting the electronically signed information and the receiving Federal agency. These agreements ensure that all conditions of submission and receipt of data electronically are known and understood by the submitting parties. This procedure is particularly desirable when terms and conditions are not specified in agency regulations. OMB's guidance also states that it is important to establish that the user of the electronic signature is fully aware of obligations to which he or she is agreeing at the time of signature.

Authorized employer personnel certify the accuracy and validity of the electronic form DC-1 through the use of their user identification (ID), password and personal identification number (PIN). These items are assigned by U.S. Bank upon completion of a valid enrollment form. This electronic signature replaces the business filer's written signature. In order to fully validate the Internet DC-1, the RRB must be able to link the user ID, password and PIN to a specific individual and verify that the individual fully understood the certification process and intended to certify the DC-1. However, the RRB cannot effectively authenticate the DC-1 form because the agency and U.S. Bank have insufficient controls over the Internet enrollment process.

Prior users of other deposit methods for this system did not have to sign any type of statement acknowledging their approval to enroll in the Internet option or their understanding and agreement that the use of their user ID, password and PIN would constitute certification of a transaction. U.S. Bank mailed a unique user ID and password to all persons of record who were previously enrolled to use one of the other deposit methods. These railroad individuals did not have to complete new enrollment forms for system access. Instead, access to the Internet system was granted based on their prior enrollment form for one of the other deposit methods. These enrollment forms did not provide any information about the new and important terms and conditions of enrollment in this system.

New users of the system are sent an enrollment form that has not been updated to include full details on the new Internet option. Thus, new users do not receive sufficient information about the terms and conditions of the Internet system and do not provide written acknowledgment that they understand and agree that their user ID, password and PIN represent an electronic signature.

In addition, all Internet users are not sufficiently informed and reminded of the importance of the user ID, password and PIN. The RRBLink Users Manual that is mailed to users and the RRBLink website screens do not have any information on the importance of certification.

Because of inadequacies in the enrollment process and the lack of sufficient information regarding the certification of the Internet DC-1, the certification of every Form DC-1 filed using the Internet, including the corresponding RUIA payment, can be repudiated. As a result, the RRB might not be able to enforce civil or criminal penalties for false or fraudulent statements, as provided under federal law.

Recommendation

BFO should direct U.S. Bank to:

- revise Internet enrollment forms to clearly explain that use of the user ID, password and PIN constitutes certification of a Form DC-1. In addition, the form should include a section requiring the applicant to acknowledge their understanding and approval of this fact by written signature (Recommendation #1).
- obtain new enrollment forms for all individuals currently enrolled in the system (Recommendation #2).
- revise the RRBLink Users Manual and include information on the RRBLink website screens to clearly explain that use of the user ID, password and PIN constitutes certification of a Form DC-1 (Recommendation #3).

Management's Response

BFO concurs with all three recommendations and will confer with U.S. Bank by January 31, 2003 to determine when the recommendations can be implemented and the associated costs. BFO will determine final completion dates for corrective action after obtaining this information from U.S. Bank. A copy of the complete response is included in Attachments I and II.

Password Security Needs Strengthening

Authorized Internet users are sometimes sharing their access to this secure system with individuals who have not been officially granted access to the electronic payment system. These users have either given their user ID, password, and PIN to a coworker not previously authorized by U.S. Bank or have logged on to the system for another unauthorized individual to use. As a result, unauthorized users have access to this system.

Strong password security ensures proper access to systems and data. The General Accounting Office's Federal Information Systems Control Audit Manual and the National Institute of Standards and Technology's Federal Information Processing Standards, Publication 112, advise that passwords should be individually owned, rather than owned in common or in groups, in order to provide individual accountability within a computer system. The password should be controlled by the assigned user and not subject to disclosure. The OMB's implementation guidelines for GPEA state that agencies should establish adequate guidelines for password creation and protection.

In order to access the Internet, a railroad individual must log on with a valid user ID, password and PIN. In order to obtain authorized access, the individual must complete an enrollment form in writing and mail the form to the U.S. Bank system administrator. Upon validation of this form, the system administrator will mail a confirmation of enrollment containing information needed for authorized access.

Individuals are responsible for the security of their access information. They are not to share their user ID, password and PIN. Each individual that needs access to the system should complete an enrollment form and obtain his/her own access. There is currently no restriction on the number of authorized users that a railroad employer can have.

The RRB has not instructed U.S. Bank to educate users about the importance of maintaining security over access. The Users Manual does not emphasize the importance of password security and the prevention of access to the system by unauthorized users. RRBLink documentation and instructions do not inform users that they should not share their access with coworkers. There is no global message on the RRBLink website nor do any of the website screens include information regarding password security. In addition, the confirmation of enrollment form for the system does not provide information on password security.

Because some authorized users do not practice prudent security over their access, it is more difficult for the RRB and U.S. Bank to adequately maintain secure control over the Internet system. Poor password security and practices unduly compromise the Internet system and employer data because they allow unauthorized users to conduct unapproved and invalid transactions and obtain access to confidential data, including tax information. These poor practices also undermine controls mentioned in our previous finding concerning the validation of certification of Internet DC-1 reports and payments.

Recommendation

BFO should direct U.S. Bank to:

- revise the RRBLink Users Manual to include a section on password security and provide a copy of this revision to the enrolled users. At a minimum, this section should include statements: (a) prohibiting the sharing of passwords and logging on

of unauthorized users and (b) explaining the risk to the system and its data of improper password usage (Recommendation #4).

- include information regarding password security on the RRBLink website (Recommendation #5).
- include a statement regarding password security on the confirmation of enrollment forms provided to individuals granted access (Recommendation #6).

Management's Response

BFO agrees with all three recommendations and will confer with U.S. Bank by January 31, 2003 to determine when the recommendations can be implemented and the associated costs. BFO will determine final completion dates for corrective action after obtaining this information from U.S. Bank. A copy of the complete response is included in Attachments I and II.

Important Password System Controls Were Not Implemented

The contractor did not fully implement two important password controls: restrictions on password use and limits on log-on attempts. The system did not restrict the use of old passwords even though users had to periodically change their password. As an example, a user could change his password and then immediately change back to the previous password. In addition, invalid log-on attempts were not limited, recorded or reviewed.

Strong password controls ensure proper and valid access to systems and data. The General Accounting Office's Federal Information Systems Control Audit Manual and the National Institute of Standards and Technology's Federal Information Processing Standards, Publication 112 contain general guidelines for securing information technology systems for the Federal government. The guidelines indicate that passwords should be changed periodically and should have restrictions on re-use, such as prohibiting re-use for a set time period. These standards also indicate that attempts to log on with invalid passwords should be limited, and invalid attempts should be recorded by the system and regularly reviewed. The RRBLink Users Manual also states that passwords cannot be reused for 90 days.

U.S. Bank had agreed to include the password reuse control when developing the system. However, an oversight in development resulted in the control not being programmed into the system and RRB testing did not identify this control deficiency. The RRB did not request inclusion of an access control for log-on attempts in the system development and therefore, the contractor did not build this security control into the system.

The lack of a password reuse control and the fact that invalid logon attempts are not limited, recorded, or reviewed unduly compromise the Internet system and employer data. Unauthorized users and computer hackers could more easily gain access to the system, conduct unapproved and invalid transactions, and obtain access to confidential data, including tax information.

Weaknesses in these password system controls also undermine controls mentioned in our previous findings to ensure adequate validation of certification. Once the OIG informed the U.S. Bank system administrator that the password reuse standard detailed in the Users Manual was not in effect, U.S. Bank implemented the control. The OIG re-tested this control and determined that it is now working as intended. Therefore, the OIG is not making a recommendation concerning this finding.

Recommendation

BFO should direct U.S. Bank to:

- Implement a control to limit the number of invalid logon attempts (Recommendation #7), and
- Implement a policy to record invalid attempts in an exception report and review the report for potential follow-up action (Recommendation #8).

Management's Response

BFO concurs with both recommendations and will confer with U.S. Bank by January 31, 2003 as to when the recommendations can be implemented and the associated costs. BFO will determine final completion dates for corrective action after obtaining this information from U.S. Bank. A copy of the complete response is included in Attachments I and II.

The 2002 MOU Regarding Internet DC-1 Form Lacks Key Details

The RRB and U.S. Bank recently signed a new MOU regarding retention of the DC-1 data and RRB requests for information. This agreement is not adequate because it does not state:

- the amount of time the bank has to reply to a request for information;
- how the bank will determine costs for handling information requests;
- who has the right to audit the amounts charged by the bank;
- the mechanism for resolving disputes over provisions;
- the penalties for non-compliance with the agreement;

- exactly what documentation the bank needs to release information; and
- what information must be provided by the bank (it only states what information may be provided by the bank).

A MOU is an agreement between two parties that should include clearly defined performance requirements and details to satisfy both parties' needs. The MOU language should be sufficiently clear and detailed to avoid disputes over provisions of the agreement or to easily remedy any disputes.

The 2002 MOU does not contain these provisions because program personnel who prepared the document believed that privacy, security, controls, and other details were covered in the 1993 MOU that governed RRBLink. Therefore, they believed that these provisions did not need to be restated in the current agreement. However, the provisions of the 1993 agreement between Treasury and U.S. Bank do not automatically apply to the 2002 MOU between the RRB and the bank because there are different parties to each agreement. In addition, the Form DC-1 was not included in the 1993 agreement.

Because the 2002 MOU lacks key details, U.S. Bank may not meet the expectations of the RRB concerning performance of key issues such as timeliness in the release of information needed for an investigation, quality of information provided, and charges to the agency for information requested under the agreement. The agency also could incur unnecessary costs and delays because no agreement has been made concerning dispute resolution and penalties.

Recommendation

The BFO should consult with the RRB's Office of General Counsel to determine additional details, including those stated above, that are needed for the MOU and should revise the MOU accordingly (Recommendation #9).

Management's Response

BFO agrees with the recommendation and will consult with the RRB's Office of General Counsel to determine necessary MOU changes. BFO will revise the MOU by December 31, 2003. A copy of the complete response is included in Attachments I and II.

2002 MOU Monitoring Provisions for Privacy/Security of DC-1 Data Are Inadequate

The 2002 MOU does not specifically state how the privacy and security of DC-1 data will be monitored. This agreement states that the privacy and security of information as covered in the 1993 MOU applies equally to Form DC-1, but is incomplete because it does not state how the RRB will monitor this performance.

OMB Circular A-123 requires Federal managers to establish management controls that include policies and procedures to reasonably ensure that programs achieve their intended results, and that laws and regulations are followed. The agency must have adequate oversight of the security and privacy of the DC-1 data to ensure that electronic filing is meeting these criteria. In addition, the RRB's records retention schedule states that employer contribution files, which include the DC-1 data, should be maintained for six years and three months. Federal regulations require adherence to the agency's records retention schedule.

The 2002 agreement does not contain monitoring provisions because RRB management assumed that Treasury would monitor compliance since the Form DC-1 was added to the system already covered under the 1993 MOU. However, this assumption is invalid because Treasury has not formally agreed to monitor DC-1 data, and Treasury has no legal responsibility to do so. The 1993 agreement covered the collection of Federal tax deposits from railroad employers. The collection of these taxes is the responsibility of Treasury under the Railroad Retirement Tax Act. Collection of DC-1 contribution data is the responsibility of the RRB under the RUIA, as is the oversight responsibility for the privacy, security, and accuracy of this data.

Auditing the system at U.S. Bank in which the DC-1 data resides is part of the monitoring process. RRB management has advised that Treasury is currently performing a risk assessment of the bank's system. Since this data is located on the same system as the tax data, the RRB believes that it can rely on Treasury's review if Treasury includes the DC-1 in the scope of its review. However, this reliance would not eliminate the RRB's overall responsibility for the DC-1 data.

Because of the deficiencies in the 2002 MOU, DC-1 data is at risk of improper disclosure and unlawful destruction without adequate monitoring. If such actions occurred, the RRB would be in violation of Federal regulations governing records retention.

Recommendation

BFO should revise the MOU to state how the agency will monitor compliance with the privacy and security provisions of the agreement (Recommendation #10).

Management's Response

BFO agrees with the recommendation and will confer with U.S. Bank and the Department of Treasury to determine necessary revisions to the MOU. BFO will complete the MOU revisions by December 31, 2003. A copy of the complete response is included in Attachments I and II.

Increased Participation in the Internet System Is Needed

The RRB needs to encourage increased Internet participation to ensure that the system is not underused. The initial implementation of the system was encouraging, with approximately 20% of all railroads filing through the Internet for the first quarter of 2002. However, the growth during the second quarter of 2002 was minimal, as only ten additional railroads began filing in the second quarter. In addition, the railroads reporting on the Internet account for a small percentage of total RUIA contributions.

Reporting Period	Railroads Reporting	% of Railroads Filing	Contribution Paid/ Percent of All Railroads
1st Qtr, 2002	100	20%	\$1.2 million/4%
2nd Qtr, 2002	110	22%	\$1.6 million/5%

None of the seven major railroads are using the Internet for DC-1 reporting and payments. These railroads contributed approximately 70% of total RUIA compensation in calendar year 2001. By comparison, the railroads using the Internet system provided 5% or less of the total RUIA compensation during the same period.

Approximately 285 railroads paid RUIA contributions using an electronic process other than the Internet, while 121 railroads paid by check for the first quarter of 2002. These electronic payment methods include personal computer/modem and touch-tone telephone technology. Railroads that pay contributions by one of these electronic methods or that pay by check must still file a paper Form DC-1 with the RRB.

The Administration's Management Agenda includes a government-wide goal for expanded use of the Internet to provide government services. Effective implementation of this goal is important in making government more responsive to and cost-effective in servicing customers. E-government is critical to meeting current customer's expectations for interaction with the RRB. It will enable the agency to align efforts as needed to significantly improve service and reduce operating costs.

The RRB's 2000-2005 Strategic Plan states that the agency should ensure an efficient and effective reporting system for railroad employers and should deliver service at the point-of-contact ("one and done"). The plan also states that information technology resources will be developed to improve the agency's performance while operating with fewer resources and technology initiatives should fundamentally improve the efficiency and effectiveness of the agency's mission.

Railroad participation in the Internet system has not increased greatly because the RRB has not yet effectively marketed the new system throughout the railroad community. The RRB has not prepared a comprehensive plan or initiated a targeted effort to publicize the benefits of the Internet DC-1 and encourage railroads to use the system. Such a plan could include:

- aggressively promoting the new system at periodic meetings with railroads,
- conducting training sessions with railroad officials,
- publicizing the system at special meetings of the railroad trade associations, such as the Association of American Railroads and the American Short Line and Regional Railroad Association, and
- enhancing the RRB's website to more prominently feature and advertise the system.

Currently, the RRB manually processes over 400 paper Form DC-1's and more than 100 paper checks for contribution payments each quarter. Increasing the use of Internet filing and payment will result in significant processing savings over paper reporting and check payments. The use of the Internet allows railroads to file the DC-1 report and schedule the payment as a one point-of-contact process with the RRB online. Paper reporting requires a separate additional process to make the payment. In addition, the agency and the more than 100 railroads now paying by check will receive the additional savings of using an electronic payment process.

Recommendation

BFO should implement a plan to encourage increased railroad participation in the Internet system (Recommendation #11).

Management's Response

BFO agrees with the recommendation and advised that, after revising the RRBLink Internet enrollment form per recommendation #1, they will work with U.S. Bank and the RRB's Assessment and Training unit to implement a plan to encourage expanded usage of the Internet system. BFO will determine final completion dates for corrective action after establishing a completion date for recommendation #1. BFO also advised that for the third quarter of 2002, over 150 railroads filed through the Internet. A copy of the complete response is included in Attachments I and II.

**MEMORANDUM**

RAILROAD RETIREMENT BOARD

DEC 18 2002

TO : Henrietta B. Shaw
Assistant Inspector General for Audit

FROM : Kenneth P. Boehne *Kenneth P. Boehne*
Chief Financial Officer

SUBJECT: Evaluation of RRB E-Government Initiative:
RUIA Contribution Internet Reporting and Payment

This is in response to your request for comments on the above draft audit report.

Reply to OIG Recommendations

BFO should direct U.S. Bank to:

- revise the Internet enrollment forms to clearly explain that the use of the user ID, password and PIN constitutes certification of a Form DC-1. In addition, the form should include a section requiring the applicant to acknowledge their understanding and approval of this fact by written signature (Recommendation #1).
- obtain new enrollment forms for all individuals currently enrolled in the system (Recommendation #2).
- revise the RRBLink Users Manual and include information on the RRBLink website screens to clearly explain that use of the user ID, password and PIN constitutes certification of a Form DC-1 (Recommendation #3)
- revise the RRBLink Users Manual to include a section on password security and provide a copy of this revision to the enrolled users. At a minimum, this section should include statements: (a) prohibiting the sharing of passwords and logging on of unauthorized users and (b) explaining the risk to the system and its data of improper password usage (Recommendation #4).
- include information regarding password security on the RRBLink website (Recommendation #5).
- include a statement regarding password security on the confirmation of enrollment forms provided to individuals granted access (Recommendation #6).

- **implement a control to limit the number of invalid logon attempts (Recommendation #7), and**
- **implement a policy to record invalid attempts in an exception report and review the report for potential follow-up action (Recommendation #8).**

By January 31, 2003, we will confer with U.S. Bank as to when these recommendations (1-8) can be implemented and what costs it may assess us for implementation.

BFO should consult with the RRB's Office of General Counsel to determine additional details, including those stated above, that are needed for the MOU and should revise the MOU accordingly (Recommendation #9).

We will consult with the RRB's Office of General Counsel to determine what additional details are needed for the MOU, and revise the MOU accordingly.

BFO should revise the MOU to state how the agency will monitor compliance with the privacy and security provisions of the agreement (Recommendation #10).

We will work with U.S. Bank and the Financial Management Service (FMS) to determine what is needed to monitor privacy and security for the RUIA data, and revise the MOU accordingly.

BFO should implement a plan to encourage increased railroad participation in the Internet system (Recommendation #11).

After revising the RRBLink Internet system enrollment form per recommendation #1, we will work with U.S. Bank and Assessment and Training to implement a plan of action to encourage expanded use of the Internet system. Also, for the third quarter of 2002, over 150 railroad employers (31 percent) filed through the Internet system. You may want to update your report to reflect this information.

cc: General Counsel
Director of Fiscal Operations
Director of Programs
Director of Assessment and Training
Chief Information Officer

Reid, Wendell

From: Boehne, Kenneth
Sent: Thursday, December 19, 2002 2:13 PM
To: Reid, Wendell
Cc: Walter, John; Finn, James; Flynn, William
Subject: Evaluation of RRB E-Government Initiative

This is in response to your phone call earlier today.

- The target completion date for the action on recommendations 1 through 8 is initially January 31, 2003, to confer with and obtain cost information from U.S. Bank. Final action completion dates for these recommendations will be set shortly thereafter based on U.S. Bank's reaction to the recommendations.
- Final action for recommendations 9 and 10 will be December 31, 2003.
- A completion date for recommendation 11 will be set once we establish a completion date for recommendation 1.